

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

STACY HILL, individually and on behalf of
others similarly situated,

Plaintiff,

v.

FISHER & SHAPIRO, LLC; and DOES 1-20,

Defendants.

Case 1:11-cv-4198

UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

Defendant, FISHER & SHAPIRO, LLC, by its attorneys David M. Schultz and Justin M. Penn, respectfully requests pursuant to Federal Rule of Civil Procedure 6(b) that this court grant it an enlargement of time to file its responsive pleading, and in support thereof, states as follows:

1. On March 14, 2012, the parties appeared on the status of this case. At that status, defendant was granted until April 4, 2012 to file a responsive pleading.

2. Defendant anticipated being able to file the response pleading by that deadline. Counsel has unfortunately been unable to complete the responsive pleading due in part to the spring break schedules of counsel's family and other then unanticipated professional commitments.

3. In addition, counsel and his attorney client will be out of the office for the religious holidays and therefore anticipates being unable to meet, confer and finalize the responsive pleading until April 10, 2012.

4. Defendant respectfully requests an enlargement of time of six additional days, up to and including April 10, 2012, to file its responsive pleading.

5. This request is not intended to delay the resolution of this matter, and will not affect any pending deadlines. The next deadline is an April 16, 2012 status hearing which will not need to be moved.

6. Counsel for defendant spoke with counsel for plaintiff who does not object to this motion.

WHEREFORE, defendant respectfully requests that this Court grant it enlargement of time, up to and including April 10, 2012, to file its responsive pleading.

Respectfully submitted,

Fisher & Shapiro, LLC

By: /s/ Justin M. Penn
One of defendant's attorneys

David M. Schultz
Justin M. Penn
HINSHAW & CULBERTSON
222 N. LaSalle Street, Ste 300
Chicago, IL 60601
(312) 704-3000
dschultz@hinshawlaw.com
jpenn@hinshawlaw.com

CERTIFICATE OF SERVICE

I, an attorney, hereby certify that on April 4, 2012, I electronically filed Defendant's Unopposed Motion for Enlargement of Time with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/Justin M. Penn

Justin M. Penn